

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

TRUTEK CORP.,

Plaintiff,

Case No. 21-10312

v.

Hon. Stephen J. Murphy, III

BLUEWILLOW BIOLOGICS, INC.,  
ROBIN ROE 1 through 10, gender  
neutral fictitious names, and ABC  
CORPORATION 1 through 10  
(fictitious names),

Defendants.

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**JOINT MOTION TO EXTEND DEADLINE  
TO COMPLETE MEDIATION AND SUMMARY JUDGMENT MOTIONS  
AND TO EXTEND SUMMARY JUDGMENT BRIEFING PAGE LIMITS**

Pursuant to Eastern District of Michigan Local Rule 7.1(d)(3)(A) and the Court's inherent authority, Plaintiff/Counter-Defendant Trutek Corp. and Defendant/Counter-Plaintiff BlueWillow Biologics, Inc., through their undersigned counsel, respectfully move for an order extending the deadline to complete mediation to March 15, 2023, extending the deadline to submit summary judgment motions to March 29, 2023, and extending the page limit for briefs in support of motions for summary judgment and oppositions thereto to 40 pages.

The parties conferred and each concur in the relief sought. A proposed stipulated order will be concurrently filed through ECF's utilities function.

On November 30, 2022, the Court entered an order setting the deadline to file motions for summary judgment to January 23, 2023. (ECF No. 52.) On January 10, 2023, the Court ordered the parties to complete mediation by February 17, 2023. (ECF No. 53, PageID 1152.) Due to scheduling conflicts, the parties and the appointed mediator are unable to select a date for mediation prior to the Court imposed deadline. The parties respectfully request an extension until March 15, 2023, which would be to the benefit of the parties and productive mediation. The parties separately request an extension of the deadline to file summary judgment motions to March 29, 2023. An extension is in the interest of preserving resources and fostering more productive briefing.

Separately, the parties request that the Court extend the page limit for briefs in support of summary judgment and oppositions thereto to 40 pages. This case involves complex patent infringement claims, related invalidity counterclaims, and legal and factual issues. The parties believe that an extension on the page limit would allow for more thorough and constructive briefing and aid the Court in making a determination on the merits of the parties' respective motions.

Dated: January 23, 2023

Respectfully submitted,

/s/ Stanley H. Kremen (w/permission)

Stanley H. Kremen (*pro hac vice*)  
4 Lenape Lane  
East Brunswick, NJ 08116  
Telephone: (732) 593-7294  
Facsimile: (732) 312-5218  
*shk@shk-dplc.com*

Keith Altman

**LAW OFFICE OF KEITH ALTMAN**  
3228 West 12 Mile Road, Suite 375  
Farmington Hills, MI 48334  
Telephone: (248) 987-8929  
*keithaltman@kaltmanlaw.com*

*Attorneys for Plaintiff/Counter-  
Defendant Trutek Corp.*

/s/ Alan J. Gocha

Nicholas J. Ellis (P73174)  
Alan J. Gocha (P80972)  
**FOLEY & LARDNER LLP**  
500 Woodward Avenue, Suite 2700  
Detroit, MI 48226-3489  
Telephone: (313) 234-7100  
Facsimile: (313) 234-2800  
*nellis@foley.com*  
*agocha@foley.com*

Liane M. Peterson

**FOLEY & LARDNER LLP**  
3000 K Street NW, Suite 600  
Washington, DC 20007  
Telephone: (202) 672-5300  
Facsimile: (202) 672-5399  
*lpeterson@foley.com*

*Attorneys for Defendant/Counter-  
Plaintiff BlueWillow Biologics, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 23, 2023, I filed the foregoing document and this Certificate of Service with the Court using the ECF system.

/s/ Alan J. Gocha  
Alan J. Gocha